



INDIANA OFFICE OF SMALL BUSINESS AND ENTREPRENEURSHIP

Jacob Schpok, Executive Director

August 25, 2014

Sarah Simpson, JD
Director of Legal Affairs, Licensing and Enforcement
Indiana Board of Animal Health
Discovery Hall, Suite 100
1202 East 38th Street
Indianapolis, IN 46205

Dear Ms. Crawford,

Pursuant to IC 4-22-2-28, the Indiana Office of Small Business and Entrepreneurship (“OSBE”) has reviewed the economic impact analysis for small business associated with rule changes contained in LSA Document 14-235 proposed by the Indiana Board of Animal Health (“BOAH”). The proposed rule amends 345 IAC 1 governing the importation of live fish. Amends 345 IAC 1-3-1.5 to define what species of fish must be tested for viral hemorrhagic septicemia (VHS) and which regions are considered at-risk or affected. Adds 343 IAC 1-3-31.5 to require VHS susceptible species of live fish moved into the state to obtain a permit and, if the fish are from VHS-affected or at-risk regions, to have tested negative for the VHS virus using appropriate standards and methods.

BOAH is proposing to provide the option of testing according to the Bluebook standard or the OIE standard. The OIE standard is a certification of the overall farm, which is most cost effective for individuals shipping larger amounts of fish. Alternatively, a person can choose to test each lot of fish according to the Bluebook standard. The economic impact statement prepared by the BOAH estimates the total annual cost of compliance for those using the lot test is \$10,800 - \$15,000. The estimated total annual cost of compliance for those using the overall facility test is \$5,100 - \$8,100. When combined, the estimated annual cost of compliance for all regulated entities is \$15,900 - \$23,100. OSBE does not object to the economic impact to small business associated with the proposed rule. If you have any questions about the comments contained herein please contact me at 232.5679 or ombudsman@osbe.in.gov.

Regards,

Erik Scheub